

ANDREA BEATTY RINKER
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Boyd
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WASTE MANAGEMENT BRANCH

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February 10, 1986

Charles W. Rice, Chief
RCRA Compliance Section
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue M/S 533
Seattle, Washington 98101

Dear Mr. Rice:

This letter is in response to your letters dated January 2 and January 27, 1986, concerning Chemical Processors, Inc..

Reviewing the enclosures to your January 2 letter, it became unclear as to what closure plans were reviewed by GCA. It was also clear that we needed to compare your enforcement policy with ours.

By a phone conversation with Andrew Boyd of your office, GCA reviewed the September 29, 1985 Closure Plan. Mr. Boyd also sent a copy of USEPA enforcement policy (routing slip dated January 21, 1986).

The facility at Pier 91 was inspected on January 16, 1986.

Reviewing USEPA's enforcement policy and Ecology's enforcement policy, it seems clear to us that an Administrative Order is the appropriate form to use in this case. This form would not necessarily call for a penalty.

It is our impression that your office thinks a much stronger penalty action is indicated and we would like clarification in this matter.

Please call me at 885-1900 or call a meeting over this subject.

Sincerely,

Laurence Ashley
RCRA-Ecology, Inspector
Environmental Quality

LA/gm

cc: Earl Tower HQ Ecology

David Wright NWRO

USEPA RCRA



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